

**REMARKS**

**I. Summary of the Office Action and this Reply**

Claims 1-36 are pending. Claims 1-9, 14-15, and 33-36 stand rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,115,741 to Domenikos et al. (“Domenikos”). Claims 10, 16-19 and 22 stand rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,134,588 to Guenthner et al. (“Guenthner”). Claims 11-13, 20-21, and 23-32 stand rejected under 35 U.S.C. § 103(a), as obvious in view of Guenthner.

Claims 1, 4, 10 and 15 are amended herein to respond to the Examiner’s comments presented in paragraph 7 of the Office Action dated June 2, 2003. The amendments address the Examiner’s comments by providing emphasis and/or clarification, and place the application in condition for allowance, or alternatively, for appeal. Entrance of the amendments is respectfully requested.

**II. Discussion**

In emphasis of the discussion in Applicants’ Reply mailed March 17, 2003, it is noted that a traditional HTML/web page (parent) file contains text/code interpretable by a Web browser, etc. for displaying the interpretation of that parent file to a user, e.g. as a Web page. The user typically does not view the contents of the parent file; instead the user views the browser’s interpretation of the parent file, e.g. as a Web page. A traditional electronic address, e.g., URL, is a "physical reference" providing information required for identifying, locating, retrieving and/or

transmitting a desired file. This address contained in the parent file is not displayed to a user; instead, the browser displays to the user a corresponding hyperlink, which may be textual, an icon, an image, etc. Accordingly, the hyperlink displayed by the browser is associated with the electronic address in the parent file. No matter the form of the hyperlink displayed by the browser, the hyperlink is a point of access directly associated with a physical reference (URL/electronic address) in the parent file. This is plainly apparent when one looks at the parent file, e.g., an HTML source file, as opposed to the web page displayed by a browser as an interpretation of the source file. For example, the following text may appear in a parent/source file: <A HREF="<http://www.xyz.com/home/index.html>">Click Here</A>. Accordingly, the text "Click Here" will appear as a hyperlink in a browser, and that hyperlink will be associated with the URL (physical reference) http://www.xyz.com/home/index.html. This URL indicates that the index.html file is located in the directory named "home" on the server identified by the hostname xyz.com. Accordingly, if the physical reference (electronic address/URL) that is associated with the hyperlink becomes outdated, a broken link or an error message will occur upon selection of the hyperlink.

In contrast, the present invention employs a logical reference that does not in and of itself provide sufficient information for identifying, locating, retrieving and/or transmitting a desired file. Such a logical reference is simply a placeholder that can be matched with a conventional electronic address of a file. The logical reference appears in the parent file and therefore is analogous to a URL/electronic address as discussed above in that it may be directly associated with a hyperlink displayed via a

browser. A corresponding hyperlink displayed by a browser is directly associated with the logical reference and therefore serves as a logical point of access to a file.

See specification, page 7, lines 7-13; page 10, line 23 - page 11, line 2.

Accordingly, in the present invention, the user may select hyperlinks using a Web browser, as generally known in the art, but those hyperlinks serve as logical points of access because they are not directly associated with an electronic address for the linked file. Instead, they are directly associated with a logical reference, which is apparent from viewing the parent/source file. For example, a hyperlink displayed by a browser may be associated with the logical reference <A href="/radek/misc/fairytales.txt"> appearing in a parent/source file. The logical reference is resolved to a conventional physical reference/URL/electronic address by a server selection program for retrieval of an associated file when the corresponding hyperlink is selected. See example discussed in the application at page 11, line 8 - page 13, line 10.

This association of a logical reference in a parent file with a hyperlink provides an indirect relationship between a hyperlink and a physical reference. This allows the list of physical references corresponding to the logical reference to be updated (which may be maintained outside of the parent file), without the need to update the parent file itself (which can contain a single logical reference that can later be matched with a current list of physical references). Accordingly, outdated address information and broken links can be eliminated.

**III. Response to 102 Rejections**

A rejection under 35 U.S.C. § 102 is proper only if each and every element of the claim is found in a single prior art reference. MPEP § 2131.

**Claims 1-9, 14-15, 33 and 36**

The Examiner has rejected independent claims 1, 14, 33 and 36 under 35 U.S.C. § 102(e) as anticipated by Domenikos.

Contrary to the Examiner's assertions in paragraphs 4 and 7 of the Action, Domenikos provides no disclosure whatsoever of a logical reference contained in a parent file that uniquely identifies a file independently of an electronic address at which the file is located, as recited in amended claims 1 and claim 14. A logical reference appears in a parent file; an associated hyperlink appears in a browser as a result of interpretation of the parent file, but the hyperlink itself does not appear in the parent file. The specification makes clear that the logical reference appears in a parent/source file, and a corresponding hyperlink is displayed by a browser. Claim 1 is amended herein to emphasize and clarify this relationship.

Therefore, with respect to the Examiner's comments in paragraph 7 of the Action concerning points A and C, any textual, graphical or icon-based hyperlink displayed by a browser and disclosed by Domenikos is not a logical reference of the present invention. See Domenikos' discussion of a graphical icon that is a hypertext link to a document identified by a URL, which is a physical reference. Domenikos col. 14, lines 30 - 35.

Moreover, Domenikos provides no disclosure whatsoever of a "hyperlink being a logical point of access to a file, the hyperlink being associated with a logical reference contained in a parent file interpretable by the browser to display the hyperlink" as recited in claim 1. Instead, the conventional hyperlink of Domenikos is directly associated with a physical reference/URL in a parent file, and is not associated with a logical reference in the parent file. Col. 14, lines 30 - 35.

Claims 33 and 36 have a recitation similar to that of claim 1, expressly reciting that the logical reference of the parent file identifies the desired file independently of a URL. A logical reference is not analogous to a URL or other electronic address used by Domenikos, or any browser-displayable hyperlink disclosed by Domenikos. Whether Domenikos discloses that file pointers can be represented by hyperlinks as asserted by the Examiner in paragraph 7 of the Action (with reference to B) is of no relevance. The hyperlink is not a logical reference, or analogous to a logical reference, because the hyperlink appears in the browser, not in the parent file. Additionally, any file pointers associated with the hyperlink are physical references, not logical references. Domenikos clearly indicates that these file pointers are not logical references. See discussion in Applicant's Reply filed March 17, 2003 quoting Domenikos, Col. 15, lines 57-60; col 16, lines 1-6.

For at least these reasons, reconsideration and withdrawal of the rejection of claims 1-9, 14-15, and 33-36 are respectfully requested.

**Claims 10, 16-19 and 22**

The Examiner has rejected independent claims 10, 16 and 22 under 35 U.S.C. § 102(e) as anticipated by Guenthner.

The Examiner states in paragraph 7 of the Action (with reference to D) that "there is no indication in claim 10 that a logical reference is included with physical references in the same file in the claim." This statement is not understood, as claim 10 recited a method involving "receiving, at the server, a request for transfer to a client of a parent file containing a logical reference" and "modifying the file, at the server, by inserting therein a list of physical references corresponding to each logical reference." Thus, claim 10 recited that the physical references are inserted into the parent file containing the logical reference. Nevertheless, claim 10 is amended herein for clarity to emphasize that it is the parent file that is modified, and that the modified parent file is transmitted.

With reference to the Examiner's statement concerning point D, it is questioned whether the Examiner has interpreted "inserting" to mean "replacing." "Inserting" encompasses both adding and replacing. With respect to inserting/adding, the claim is patentable at least because the parent file contains both a logical reference and corresponding physical references. This clearly is not disclosed by Guenthner; the HAL of Guenthner includes only a list of IP addresses. With respect to inserting/replacing, the claim is patentable at least because of the recitation of inclusion of the logical reference, as discussed above. Guenthner provides no disclosure of a logical reference, which appears in a parent file.

**Application No. 09/328,657**  
**Reply to final Office Action dated June 2, 2003**

**Docket No. Breitbart 3-1**

For at least these reasons, reconsideration and withdrawal of the rejection of claims 10, 16-19, and 22 are respectfully requested.

**IV. Response to 103 Rejections**

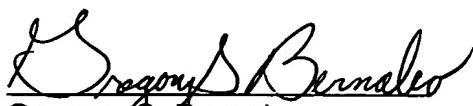
The Examiner has rejected claims 11-13, 20-21 and 23-32 under 35 U.S.C. § 103(a) as obvious in view of Guenthner. These dependent claims are believed patentable for at least the reasons set forth above.

**CONCLUSION**

In view of the foregoing amendments and remarks, Applicants believe claims 1-36 to be patentable and the application in condition for allowance. Applicants respectfully request issuance of a Notice of Allowance. If any issues remain, the undersigned request a telephone interview prior to the issuance of an action.

Respectfully submitted,

Date: July 31, 2003

  
Gregory S. Bernabeo  
Reg. No. 44,032

Theodore Naccarella  
Reg. No. 33,023

Synnestvedt & Lechner LLP  
2600 Aramark Tower  
1101 Market Street  
Philadelphia, PA 19107  
Telephone: 215-923-4466  
Facsimile: 215-923-2189